Appendix C

Affidavit of
Mitch Kaufman, Senior Manager,
MCI Worldcom Numbering Planning and Administration

Affidavit of Mitch Kaufman

I, Mitch Kaufman, declare as follows:

1. I am employed by MCI WorldCom as Senior Manager of Numbering Planning and Administration. I have held this position since December 1997.

2. The purpose of this affidavit is to describe the technical impacts to competitive local exchange carriers ("CLECs") and other carriers of the Arizona 602 area code split. The affidavit will show that splitting a rate area with two or more area codes will cause substantial harm to CLECs. By way of background, the Phoenix metropolitan area had a significant rate area consolidation in 1997, creating a large rate area in the region and encompassing much of the 602 area code. The area code split, which was ordered by the Arizona Corporation Commission (ACC) on December 22, 1998, calls for the 602 area code and the Phoenix rate area to be split into 3 different regions. Figure 1 shows the proposed area code split boundaries.
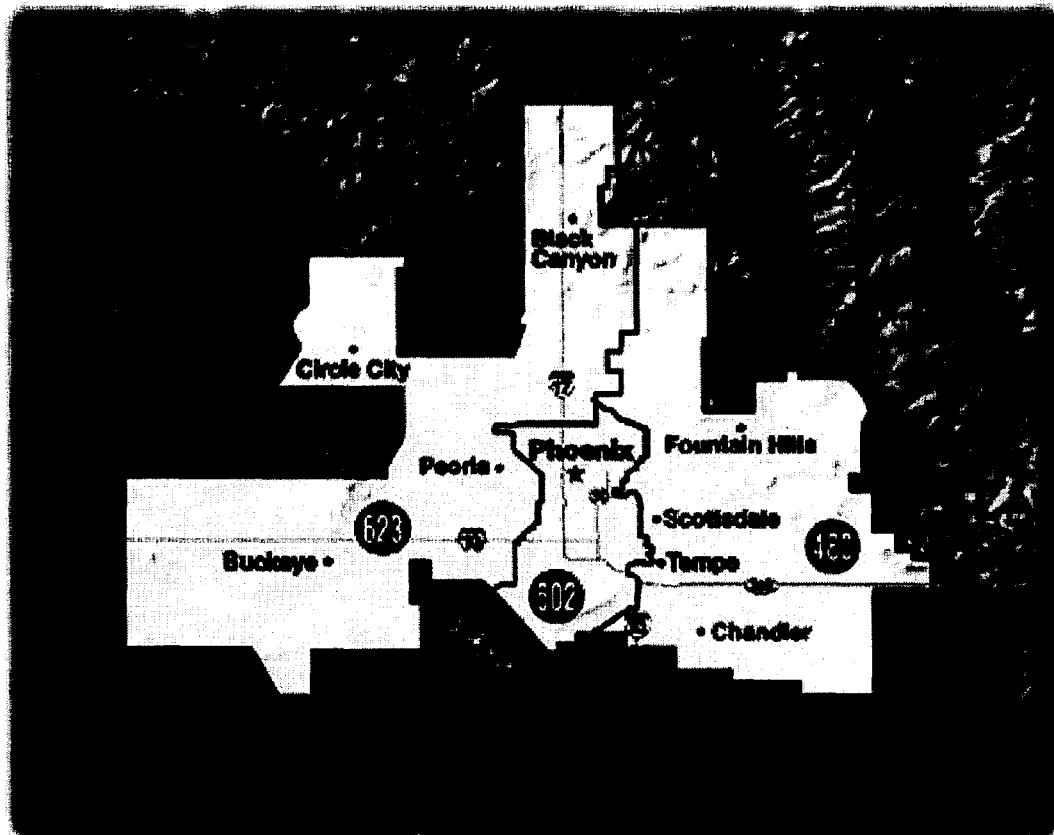

Figure 1 – Arizona 602 NPA Split Boundaries

3. To minimize impacts to wireless carriers, the ACC ordered that any NXX codes assigned to wireless carriers before October 31, 1999 will be "grandfathered." Thus, any wireless customer assigned a telephone number prior to that time will retain their 10-digit number including the 602 area code, regardless of where that customer

actually resides. Wireless customers assigned after November 1, 1999 will be given a telephone number in the appropriate area code based upon the customer's service address.[1]

4. ILEC switches cover relatively small, discrete geographic areas. NXX codes are assigned per switch to cover an area consisting of the ILEC wire center. For an illustration specific to the Phoenix area, refer to Figure 2.
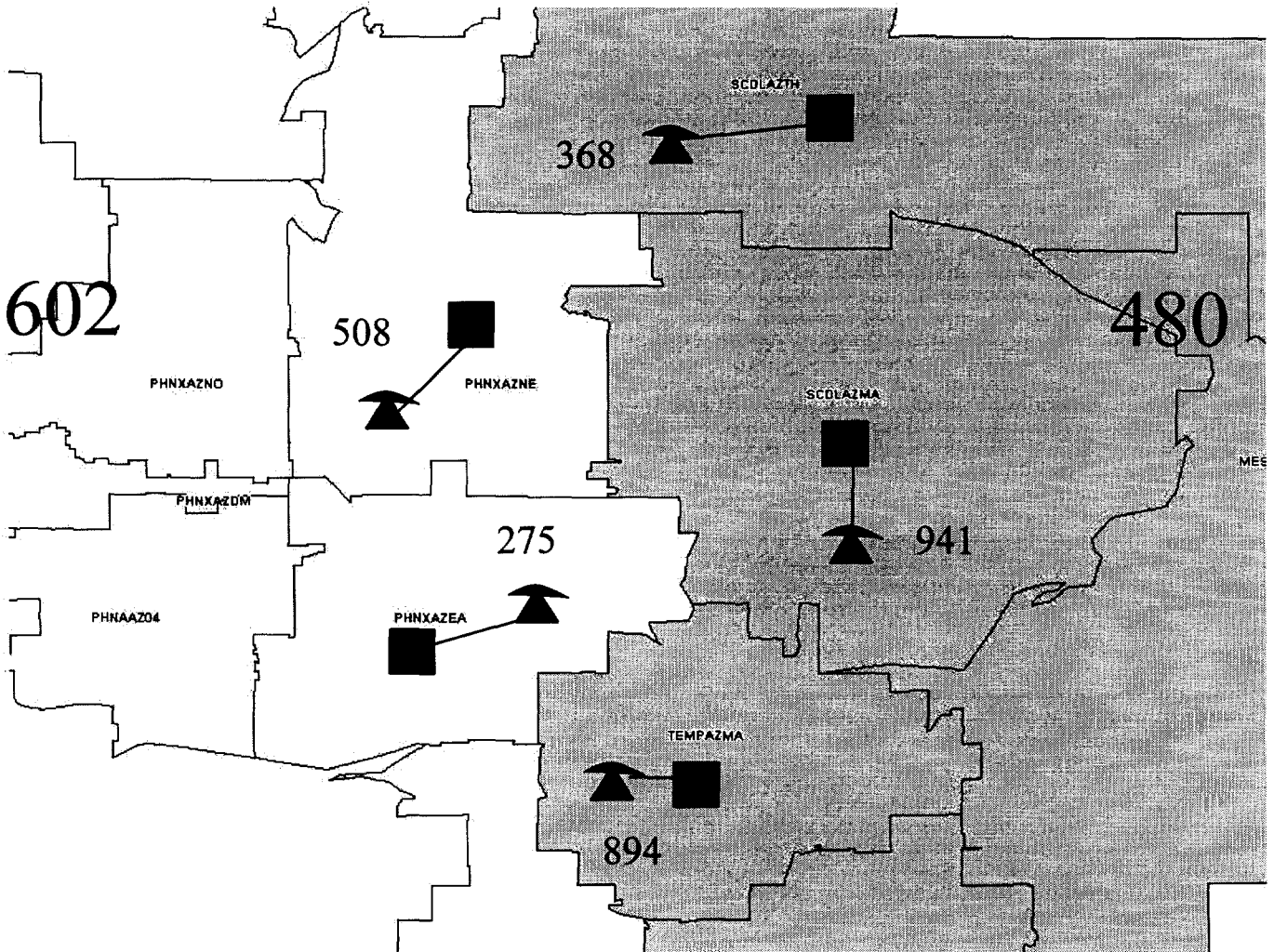

Figure 2 – U S West Wire Centers

5. Referring to Figure 2, the split boundaries defined by the ACC conform to the ILEC wire center boundaries. The shaded area contains wire centers that are located in the new area code 480. The unshaded area contains wire centers located in the post-split 602 serving area. To implement the split, U S West must determine the area code

---

[1] *Arizona Order.*

into which each wire center falls, identify the NXX codes within the wire centers, and then convert all customer numbers assigned to the NXXs to one of the two new area codes, or do nothing if the wire center remains within the 602 area code. As an example above, U S West customers in the PHNXAZNE wire center having the 508 NXX will remain in the 602 NPA and all customers in the SCDLAZMA wire center having the 941 NXX will be converted to the 480 NPA. This appears to be the same process that U S West would use for a normal split that does not partition a rate area.

6. Impacts to CLECs for a split which partitions rate area boundaries are quite different. CLEC switches cover much larger geographic areas than ILEC switches and typically cover multiple rate areas. NXX codes for CLEC switches are acquired by rate area, so typically, telephone numbers within an NXX code are assigned throughout the entire rate area, as opposed to the ILEC wire center assignment approach.[2] Refer to Figure 3 for an illustration.

---

[2] CLEC NXX coverage of an entire rate area may differ depending on how many CLEC switches cover the area.

SCDLAZTH

602

Customer C
281-1000 to
281-1099

Customer A
281-4000 to
281-4999

480

PHNXAZNO

PHNXAZNE

SCDLAZMA

MES

PHNXAZDM

Customer D
281-5000 to
281-5009

PHNAAZD4

PHNXAZEA

Customer B
281-5025 to
281-5029

TEMPAZMA

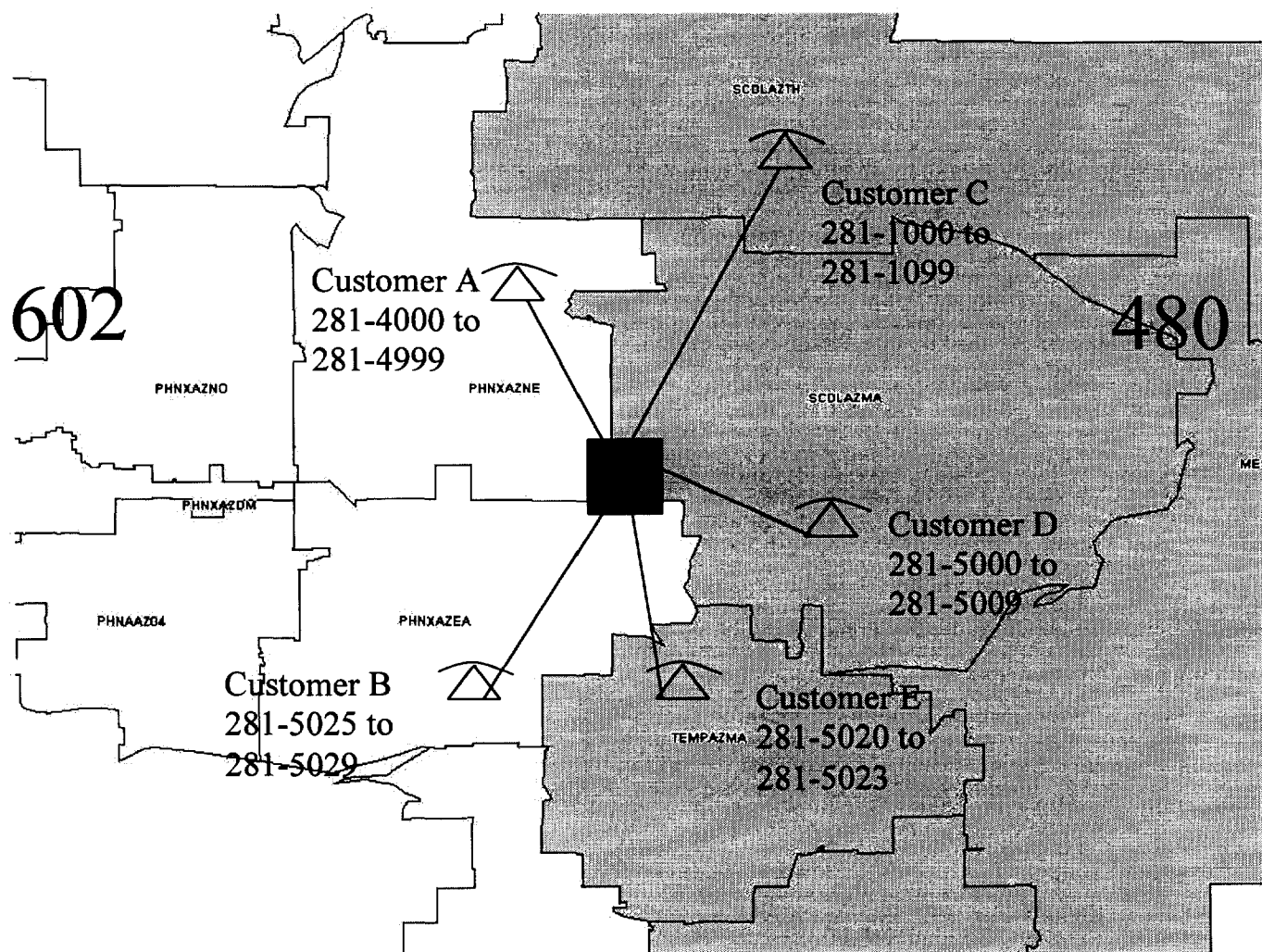Customer E
281-5020 to
281-5023

Figure 3 – CLEC Split Impacts

7. Referring to Figure 3, a single CLEC switch covers the entire Phoenix rate area. A
    single NXX code, 281, has been assigned to the switch and customers have been
    assigned telephone numbers with the 281 NXX code throughout the rate area; in this
    particular case there are five different customers.

8. In order for a CLEC to determine how it is affected, it must first be able to identify
    the boundaries of the proposed split based upon ILEC wire center boundaries. The
    ILEC wire center boundaries must be encoded in geographic mapping software
    applications, and these applications must be used in order to determine in which ILEC
    wire center the CLEC customer is located. Using the geographic mapping
    application, the CLEC must run a query on all of its customers' service addresses in

4

order to determine the ILEC wire center in which the customer is located. Take for instance, the example in Figure 3. Customer A's service address is located in the PHNXAZNE ILEC wire center, and Customer B's service address is located in the PHNXAZEA ILEC wire center. All customers are located within the Phoenix rate area.

9. The process for performing the geographic mapping of service addresses is fraught with potential errors, all of which require manual intervention. This is an extremely time consuming process that costs CLECs additional resources.

10. Once the geographic mapping of service addresses to ILEC wire centers is completed, the next step is to associate the customer's service address to an area code. Once the association of service address to area code is made, it is now possible to identify the specific customer telephone numbers which are affected by the split. Using the example in Figure 3, the telephone numbers associated with the Customer A and Customer B service addresses will be in the 602 area code and the telephone numbers associated with the Customer C, Customer D, and Customer E service addresses will be in the 480 area code.[3]

11. The CLEC must then determine the area code with which each NXX should be associated. There are different ways that a service provider can do this. One is to select the area code that has the most telephone numbers assigned within it. For instance, in the example in Figure 3, the 281 NXX code has 114 customer telephone numbers assigned on the 480 side of the split and 1,005 telephone numbers assigned on the 602 side of the split. The service provider would associate the 281 NXX code with the 602 area code.

12. In order for the CLEC to comply with the split, it must either obtain duplicate NXX codes for the new NPAs, or change the numbers for customers currently served by an NXX that will not be associated with their NPA.

13. Duplicate NXX code assignments could be made in those areas where customers have been assigned telephone numbers in NXX codes that overlap multiple area code boundaries. Using Figure 3 as an example, a duplicate NXX code assignment of the 480-281 NXX to the CLEC is necessary in order to ensure that the 114 customer telephone numbers that will be served by 480 are not impacted by the split rate area. Even though the CLEC may not require the NXX code in order to satisfy actual customer forecast needs, it is required to ensure that CLEC customers are not subject to a 10-digit number change.[4]

---

[3] In MCI WorldCom's specific case, out of a total of 16 NXX's in the Phoenix area, 6 NXXs have customers with service addresses in a single area code, 9 NXXs have customers with service addresses in two area codes, and one NXX has customers with service addresses in all three area codes.

[4] In MCI WorldCom's case, a total of 11 duplicate NXX codes must be assigned to ensure that MCI WorldCom customers are not subject to a 10-digit number change as a result of the Arizona area code split. These NXX codes have no other purpose than to prevent a 10-digit number change for customers. Preliminary indications from NANPA indicate that the duplicate NXX codes in Arizona will not be provided to MCI WorldCom.

14. The only other way for the CLEC to comply with the split is for the CLEC to impose 10-digit customer telephone number changes on those customers who are served by NXXs that will not be associated with their new area code. In figure 3, the 281 NXX code will be associated with the 602 area code because a majority of the customer telephone number assignments are on that side of the boundary. Therefore Customers A and B would retain their 281 NXX code assignment. Customers C, D and E together will require 114 telephone numbers to have a 10-digit number change to other NXX codes that may exist on the 480 side of the boundary.[5] If the CLEC has no codes in 480, at least one will need to be assigned.

15. Both of the area code split scenarios identified above (duplicate NXX codes and 10-digit customer number changes) have major impacts to inter-exchange carriers (IXC) as well as local providers. Since there is no simple way of identifying the split impacts to CLECs based solely on their NXX codes, IXCs cannot have a simple conversion of their own long distance customers' service order records. Other more specific identification of CLEC customers impacted by the split must be exchanged with IXCs, such as with Customer Account Record Exchange ("CARE") transactions.

16. So far, this affidavit has described effects on customers served out of a CLEC's own inventory of numbers. However, a geographic split that divides a rate area, such as the 3-way split ordered by the ACC, can also affect customers who have ported numbers that were originally assigned by other carriers. Such a plan introduces limits to local number portability that were not experienced before the split. For example, ILEC customers that port-in to CLECs may be affected by this type of split. Customers that port from a CLEC to the ILEC might also be affected. Refer to Figure 4 for an example.

---

[5] In MCI WorldCom's case, approximately 12% of the total telephone numbers assigned would require a 10-digit number change in order to comply with the Arizona area code split.
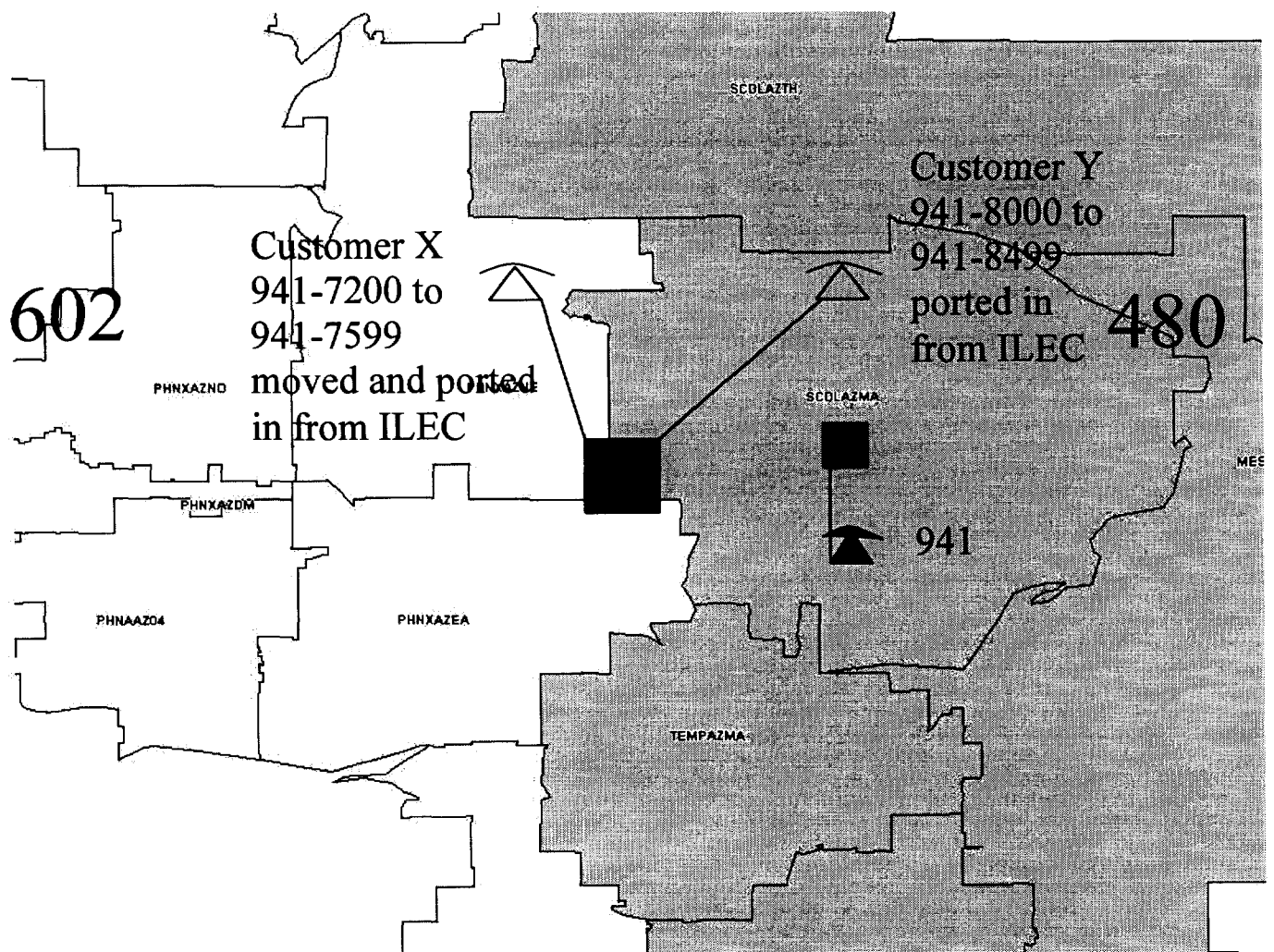
Figure 4 – LNP Implications of Split

17. There are different LNP scenarios that must be considered when assessing the impacts caused by an area code split that segments rate area boundaries. A complicating factor is that porting of telephone numbers can involve some movement within the rate area. As an example, refer to Figure 4. A CLEC has ported-in two different customers from the ILEC 941 NXX code. This NXX code, in the ILEC environment, is used for customers within the bounds of the SCDLAZMA wire center. One customer does not have any movement associated with their port and they remain within the SCDLAZMA wire center boundaries. The other had some movement to the PHNXAZNE wire center associated with their port to the CLEC. This is not unusual since a business or residential customer may reassess its local

7

service provider upon relocation. In addition, there is a general industry consensus in favor of allowing porting within the rate area.

18. The telephone numbers associated with CLEC Customer Y's service will not result in any issues to the CLEC service provider, since the ILEC wire center remains the same. When the ILEC implements the split for its own customers that have the 941 NXX code, they will convert to the 480 area code based upon the area code split boundary definitions of the wire centers. The CLEC service provider having a ported-in customer with the same 941 NXX code will also have to convert Customer Y's area code to 480 as long as their service address remains in the SCDLAZMA wire center.

19. However, because Customer X moved their service address location to the PHNXAZNE wire center, which is in the 602 area code, there will be impacts to this CLEC customer. Again, there are two options for the CLEC service provider. The first is to ensure assignment of the duplicate NXX code in the other area code to ensure that the ported customer's telephone number will not require a 10-digit number change; but this time the duplicate NXX code is associated with the ILEC assigned NXX code.[6] The reason why this duplicate NXX code is required is to ensure that LNP default routing can operate as intended by the LNP specifications. In the example in Figure 4, if no duplicated code were available for the 602-941 NXX code, all local calls originating from non-LNP capable switches (i.e., wireless providers and others who are exempted from implementing LNP) would have no routing associated with the NXX code and therefore the calls would fail.

20. The second option is to perform a 10-digit number change to the customer's number. In the example in Figure 4, a total of 400 customer telephone numbers are required to be changed (these are Customer X's telephone numbers).[7] The 10-digit number change has significant competitive issues that require customers to change their numbers which make this option unacceptable for implementation (particularly since these customers ported to keep their numbers in the first place).

21. In summary, both of the options that exist to implement an area code split that segments rate area boundaries are suboptimal. Assignment of duplicate codes unnecessarily assigns NXX codes to carriers that would not normally need them. The other option is to require a 10-digit number change for customers, which is competitively unacceptable and may also involve NXX code assignments that would not otherwise be needed. The only area code relief option for the Arizona specific situation that is both competitively neutral to all carriers and uses NXX codes efficiently, is an overlay.

---

[6] In MCI WorldCom's case, there are three NXX codes that will need to be duplicated in order to ensure that ported-in customers do not require a number change.

[7] In MCI WorldCom's case, approximately 1.5% of all ported in numbers will require a 10-digit number change if duplicate codes are not allocated.

8

                    \s\
Mitch Kaufman
Senior Manager
Numbering Policy and Administration
MCI WorldCom, Inc.
8521 Leesburg Pike
Vienna, Virginia 22182
703-918-6083

Appendix D

602 NPA (Arizona) Jeopardy Procedures Extraordinary Code Conservation Measures, December 14, 1998, North American Numbering Plan Administrator Central Office Code Administration.

602 NPA

(Arizona)

Jeopardy Procedures

Extraordinary Code Conservation Measures

12/14/98

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

Introduction

These jeopardy procedures for Extraordinary Code Conservation Measures are submitted for the consideration of industry participants in the jeopardy procedures process – code holders, potential code holders and other stakeholders such as the state regulatory commission.

The purpose of these extraordinary code conservation measures is to generate thoughts and ideas for discussion by industry members. The objective is to formulate the most fair and equitable means of managing the limited number of central office (CO) codes/NXXs for the benefit of all service providers in the NPA(s).

Questions regarding the content of this plan may be directed to either:

> Joanne Edelman, Senior Code Administrator
> NANPA CO Code Administration
> 925-363-8710 (voice)
> 925-363-8729 (fax)
> joanne.edelman@nanpa.com

> Or
> Craig Wiseman
> NPA Relief Planner
> 303-841-1329 (voice)
> 303-646-2197 (fax)
> craig.wiseman@nanpa.com

1)

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

Summary of Key Dates

Table A	
Action/Activity	**Key Dates**
Code Rationing Period	
• Interim Jeopardy Procedures Begins (with jeopardy declaration)	November 18, 1998
• Code Rationing Begins (in accordance with these procedures)	January 18, 1999
• **Monthly Submission Deadline** (for Part 1 code requests)	5th business day
• Monthly Code Allocation Day (if lottery required)	12th business day
• Last Lottery Date	July 1999 (12th Business day)
Non-Jeopardy Code Requests	
• Earliest Date to Submit Requests for Reservation of Codes	6 months prior to start of new NPA
• **Earliest Effective Date NOT SUBJECT to Jeopardy Procedures**	First codes effective 1 month after start of mandatory*
• **Earliest Date to Submit Non-Jeopardy Procedure Requests**	6 months prior to start of new NPA
• Last Day of Permissive Dialing	September 1, 1999

* For assignment of non-duplicated codes. The effective date of duplicated codes will be November 1, 1999 or after.

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

2) Code Rationing Period

a) Beginning January 1, 1999, CO Code (NXX) assignments for the 602 NPA will be rationed.
b) Rationing of codes will continue through the 12th business day of July 1999.
c) Codes rationed during this period will be those that have a requested effective date earlier than September 16, 1999, for non-duplicated codes. Duplicated codes will have an effective date of November 1, 1999, or after.

3) Number of Codes That May Be Assigned

a) A base quantity of 6 NXXs may be assigned each month from January 1, 1999, through July 1999 (the 12th business day).

   i) This is the monthly "code allotment."
   ii) This code allotment is derived by dividing the number of codes available for assignment at the start of the code-rationing period by the number of months remaining until the end of the code-rationing period as defined above.

b) In the event that NXXs are recovered during the code-rationing period, then the monthly allotment will be recalculated to reflect this larger number of available codes.

   i) The CO Code Administrator may adjust the monthly allocation as a result of code recovery without seeking industry consensus.
   ii) Notice of any recalculated monthly allotment will be posted on the NANPA Web site (under "Bulletin Board"/"Jeopardy Information").
   iii) Recalculated allotments will be available for assignment the month after the Web notice is posted.
   iv) The Code Administrator will send an E-mail/Fax notice to stakeholders on file advising that the number of monthly codes has been revised/check the NANPA Web site for details.

c) If the code allotment for any given month is not fully assigned, the unassigned quantity will "carryover" and will be added to the following month's code allotment. (The monthly code allotment calculation is not affected by carryover quantities.)

d) There will be only one "pool" from which all code assignments will be made.

e) There will be no distinction as to whether an applicant is an existing service provider or a new market entrant.

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

f) There will be no distinction as to whether a request is for an initial code, growth code or "new application" of a code.

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

4) Inclusion in Monthly Rationing Process

a) *Requests received by the submission deadline in any given month will be included in that month's rationing process provided that all "Eligibility Requirements" have been met by that date.*

b) Requests received after the submission deadline in any given month will be included in the following month's rationing process provided that all "Eligibility Requirements" have been met by that next month's submission deadline.

c) If a request is suspended, but required data/supporting documentation is received by the submission deadline of any given month, the request will be included in that month's code rationing process.

d) If a request is suspended and required data/supporting documentation is not received by the submission deadline, the request will be ineligible for participation in any monthly rationing process/lottery until all eligibility requirements have been met.

5) Number of Requests That May Be Submitted

An applicant may submit no more than three Code Assignment Requests per month.

a) Requests for more than one code are to be identified by the applicant as 1st choice, 2nd choice and, if applicable, "3rd" choice.

b) For these jeopardy procedures, "applicant" is defined as an entity with a valid, NECA assigned "OCN" (Operating Company Number/Company Code).

c) If an OCN submits more than "3" requests by the submission deadline for any given month, only the first "3" requests received will be accepted; the others will be denied.

d) This number of requests includes any held priority requests.

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

6) Deadline for Submission of Requests

a) *Requests must be received <u>no later than 5:00 p.m., Pacific Time, on the 5th business day of the month starting January 1,1999, through the last lottery month (July 1999).</u>*

b) Requests may be submitted anytime from the 6th business day of the previous calendar month to the submission deadline of the current month. (Requests for the January 1999 Allocation/Lottery can be submitted upon receipt of these guidelines.)

c) Requests are to be delivered to the NANPA CO Code Administrator by facsimile, E-mail or messenger (e.g., FedEx, Airborne, etc.) as specified below:

Table B 602 NPA Code Requests	
For Fax or E-mail Delivery:	Paula Hustead CO Code Administrator **925-363-8733 (fax)** E-mail: paula.hustead@nanpa.com "cc" e-mail requests to: cecilia.louie@nanpa.com
Address for Messenger Delivery:	NANPA CO Code Administration 1800 Sutter Street, Suite 570 Concord, CA 94520 Attn: Paula Hustead 925-363-8706 (voice)

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

7) Requested Effective Date

a) *The requested effective date must be at least 66 calendar days after the lottery date.*
   i) Requests with an earlier requested effective date will be denied.
   ii) This is the industry-standard code activation timeline.[1]

b) *The requested effective date may not be more than 6 months after the lottery date.*
   i) Requests with a later requested effective date will be denied.
   ii) This is the industry-standard code maximum ordering interval.[2]

c) *If a requested effective date is on or after September 16, 1999, (for non-duplicated codes or November 1, 1999, for duplicated codes) the request will not be subject to these jeopardy procedures.*

8) Reservation of Codes

a) *NANPA will not accept requests for code reservation in the new NPAs prior to May 1, 1999.*
   i) Requests to reserve a code that are received prior to this date will be denied.

   ii) If it becomes necessary to extend/continue jeopardy for the 602 NPA for any reason, code reservation requests will be denied for that extended period of time.

---

[1] *Central Office Code (NXX) Assignment Guidelines*, (INC 95-0407-008).
[2] *Central Office Code (NXX) Assignment Guidelines*, (INC 95-0407-008).

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

9) Eligibility Requirements

a) *The requested effective date on the Part 1 must fall within the allowable timeframe.*
(See "Requested Effective Date.")

b) *There is only one rate center for the 602 NPA -- Phoenix. Requests should indicate which locality (wire center) the OCN wishes to serve or which switch CLLI the code will reside on.*

c) *A valid entity name/OCN association must be specified on the Part 1 Code Request.*
   i) This association must match National Exchange Carrier Association (NECA) assignments as reflected in the Bellcore Routing Data Base System (RDBS).
   ii) If the applicant is "doing business as" *(d.b.a.)* another company, the NANPA CO Code Administrator must be given a memo specifying all affected entity names and OCNs.
   iii) OCN/entity name must be valid/explained by the code request submission deadline.

d) *The applicant OCN must be authorized to provide service in the jeopardy NPA.*
   i) The *type of authorization* (CPCN #, tariff # or FCC license #) must be specified.
   ii) The *type of entity* requesting the service (franchised local carrier, competitive local exchange service carrier, CMRS, etc.) must be specified.
   iii) The *type of service* to be provided by the requested code (end office, paging, cellular, PCS, etc.) must be specified.

e) *In accordance with Industry guidelines, each Industry member company must submit a jeopardy COCUS to the Code Administrator within thirty (30) days of the jeopardy being declared. Industry members are encouraged to show their cooperation during the jeopardy by submitting their jeopardy COCUS as early as possible to give the Code Administrator the best possible information for managing the remaining number resources for the exhausting NPA. As member companies forecasts and plans change during the jeopardy, updated jeopardy COCUS information will assist the Code Administrator in anticipating the aggregated requirements of the area. All individual company jeopardy COCUS information is confidential. A jeopardy COCUS must be submitted in order to be eligible to receive an NXX in these NPAs.*

f) *A Months-to-Exhaust form must be filled out and submitted to the Code Administrator*

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

with every code request for this NPA, per the Arizona Corporation Commission Decision No. 59311 (rendered 10/2/95), Docket No. E-1051-95-259, Findings of Fact, Paragraph 18f, viii. However, the Months-to-Exhaust needs to be for a six month period only.

10) Suspension of Requests

   a) Part 1 Code Requests that have incomplete or inaccurate data will be suspended.

   b) Suspended requests will be ineligible to participate in the monthly code rationing process until complete and accurate data is provided.
      i) The rationing month for which such requests will be eligible will be depend upon whether the required data is received by the submission deadline for that month.
      ii) If the required data is received after cutoff for the July 1999 allocation/lottery, the request will be processed according to normal (non-jeopardy) procedures.

11) Denial of Requests

   a) If an OCN submits more than three (3) code requests for any given month code rationing process, the "additional" request(s) will be denied. (See "Number of Requests That May Be Submitted.")

   b) If the requested effective date is outside the allowable timeframe, the request will be denied. (See "Requested Effective Date.")

   c) If a request to reserve an NXX code is received before the allowed reservation submission date, the request will be denied. (See "Reservation of Codes.")

   d) If the code applicant is not authorized/certified to provide service in the state/NPA, the

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

request will be denied. (See "Eligibility Requirements.")

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

12) Code Rationing Process

Table E		
Overview of the Code Rationing Process		
(Based on Total Requests)		
Total number of <u>eligible</u> <u>requests</u> received by the submission deadline	Available codes will be rationed in the following manner	Effect upon the following month's code rationing process
Equal To the total number of codes available for assignment that month (Note 1)	Each request receives a code assignment (Note 2)	No effect
Less Than the total number of codes available for assignment that month (Note 1)	Each request receives a code assignment (Note 2)	Remaining quantity of codes will carryover to the following month
Greater Than the total number of codes available for assignment that month (Note 1)	Assignments made according to "Code Allocation Procedure"	Depends on the results of the current month's code allocation procedure

Note 1: Total codes available for assignment in any given month is equal to the monthly code allotment plus any carryover from the preceding month(s) rationing process.

Note 2: If code allocation procedures are not required, then codes will be assigned by the 10th business day after the "submission deadline." (Refer to "Deadline for Submission of Requests" section.)

13) Code Rationing Versus Code Allocation

a) The terms "Code Rationing" and "Code Allocation" as used in these jeopardy procedures both refer to extraordinary code conservation measures in a declared jeopardy NPA(s).

b) The term *"Code Rationing"* refers to a situation in which there is specified *limit on the number of codes that may be assigned in any given month.*

c) The term *"Code Allocation"* refers to the *means of determining which code requests will receive a CO code assignment in any given month.* Lottery is one method of allocation.

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

14) Governing Principles for Code Allocation

a)   *The basic rule for code allocation is as follows:*
   In any given month, each OCN submitting an eligible request will receive one code before any OCN receives two codes and each OCN submitting eligible requests for more than one code will each receive two codes before any OCN receives three codes.

b)   *Code allocation will be required whenever:*
   The total number of eligible requests received by the submission deadline is greater than the total number of codes available for assignment for that rationing month (base allotment plus any preceding month carryover).

c)   *CO code assignment via code allocation will be based on:*
   The number of applicants (i.e., OCNs) that have submitted eligible requests.

d)   *To be eligible for inclusion in any given month's code allocation procedure:*
   A code assignment request must meet all Eligibility Requirements by that month's submission deadline.

15) Allocation/Lottery Date

a)   *When required, code allocation/lottery will take place on the <u>12-business day of the month</u> ("code allocation day").*

   Details of the code allocation procedure for each of the four possible scenarios are provided on the following pages.

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

16) Code Allocation Procedure

a) *If the number of eligible code requests received by the submission deadline of any given month is greater than the total number of codes available that month, codes will be assigned based on a code allocation procedure. (See Table below.)*

b) *Code allocation will be based on the <u>total number of OCNs submitting eligible requests</u>, NOT the number of requests.*

c) *OCNs that do not receive a code will receive a priority number.*
   i) *Priority numbers are tracked each month on a "code waiting list."*
   ii) *A priority number establishes the relative position of an OCN's request on the "code waiting list."*
   iii) *A priority number entitles an OCN to be given a code before any new requests receive a code assignment.*

Table F				
Overview of Code Allocation Procedure (Based on Number of OCNs)				
Total number of OCNs submitting eligible requests	Is any OCN requesting two or more codes?	This is how codes will be allocated	What happens if an OCN submitted more than one request?	Effect upon next month's rationing
OCNs Equal To available codes (Scenario 1)	Doesn't Matter	Each OCN will receive one code	2nd and 3rd code requests will be denied	No effect
Fewer OCNs than codes	No (Scenario 2)	Each OCN will receive one code	(not applicable)	Unassigned quantity will carryover
	Yes (Scenario 3)	Each OCN will receive one code	See description of Scenario 3 ("Multiple Requests per OCN")	Depends on results of allocation process
More OCNs than available codes (Scenario 4)	Doesn't Matter	Based on Lottery results	See description of Scenario 4 ("Lottery Process")	Depends on lottery results

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

17) Code Allocation–Scenario 1: Requests Equal Codes

a) This allocation applies whenever the *number of OCNs* submitting eligible requests is *equal to the number of codes available* for assignment in any give month ("code allotment" plus any "carryover")

b) Each of the applicants (companies/entities/OCNs) will receive one code.

c) *For applicants submitting more than one request, this assignment will be to the request designated by the applicant as 1st choice.*

d) *Requests designated by any OCN as 2nd and 3rd choice will be denied.*

18) Code Allocation–Scenario 2: Fewer Requests Than Codes

a) When the *number of applicants and/or eligible requests* submitted is *less than the number of codes available* for assignment in any give month ("code allotment" plus any "carryover") *provided that each applicant has requested only one code.*

b) *Each of the applicants (companies/entities/OCNs) will receive one code.*

c) *The difference between the total number of codes available for assignment in the current month and the number of codes assigned will be carried over and added to the subsequent month's code allotment ("carryover").*

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

19) Code Allocation–Scenario 3: Multiple Requests per OCN

a) This code allocation will be conducted whenever all 3 of the following conditions exist:
  i)   The total number of eligible requests in any given month is greater than the total number of codes available for assignment in that month.
  ii) The number of individual OCNs submitting those eligible requests is less than the total number of codes available for assignment.
  iii) One or more OCNs have eligible requests for more than one code that month.

b) Each applicant will receive at least one code.
  i) If the applicant has a priority number, the assignment will be to that request.
  ii) For applicants submitting new requests for more than one code, the assignment will be to the request designated by the applicant as 1st choice.)

c) Assignment of a second code will be made in the following manner:
  i) If the number of codes remaining is equal to the number of applicants submitting eligible 2nd code requests:
    (1) Each applicant requesting a second code will receive one for their 2nd choice request.
    (2) All requests for a 3rd code assignment will be denied.
  ii) If the number of codes remaining is less than the number of applicants submitting eligible 2nd code requests:
    (1) Requests for a 2nd code will be placed into a "second code pool."
    (2)   Requests drawn at random from the "second code pool" will receive a CO code.
    (3)   The assignment will be to the request designated by the applicant as 2nd choice.
    (4)   Requests not drawn from the "second code pool" will be denied.
    (5)   All requests for a 3rd code assignment will be denied.
  iii) If the number of codes remaining is greater than the number of applicants submitting eligible 2nd code requests and there are no requests for a 3rd code:
    (1) Each applicant requesting a second code will receive an assignment for their 2nd choice request.
    (2) The difference between the total number of codes available for assignment in the month and the number of codes assigned will carryover to the following month.
  iv) If the number of codes remaining is greater than the number of applicants submitting eligible 2nd code requests, but there are requests for a 3rd code:

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

(1) Each applicant requesting a second code will receive an assignment for their 2nd

   choice request.

(2) Requests for a 3rd code will be placed into a "third code pool."

d) Assignment of a third code will be made in the following manner:
   i) Requests drawn at random from the "third code pool" will receive a CO code.
   ii) The assignment will be to the request designated by the applicant as 3rd choice.
   iii) Requests not drawn from the "third code pool" will be denied; they **will not** receive an NXX and **will not** receive a priority code.

20) Code Allocation—Scenario 4: Lottery

a) A lottery will be conducted whenever both of the following conditions exist:
   i) The total number of eligible requests in any given month is greater than the total number of codes available for assignment in that month.
   ii) The number of individual OCNs submitting those eligible requests is also greater than the total number of codes available for assignment.

b) A maximum of three codes requests per OCN may be entered into the lottery.
   i) If an OCN has a priority number, that will represent one of the OCN's entries.
   ii) OCNs with one priority number may submit no more than two new requests in any given month until the priority request has received a code assignment.
   iii) OCNs with two priority numbers may enter only one new request in any given month.
   iv) OCNs with three priority numbers may **NOT** enter any new requests until at least one of the priority number requests has received a code assignment; such requests will be denied.

c) OCN requests that carry a priority number will be the first to receive a code assignment in the subsequent month(s).
   i) Priority number requests will be assigned in priority sequence on the 10th business day of each month as indicated below.
   (1) If the total quantity of priority requests does not exceed the number of codes available for assignment that month, then all priority numbers will receive a code assignment.
   (2) If the total quantity of priority requests exceeds the number of codes available for assignment in that month, then codes will be assigned to

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

priority numbers until the monthly code allotment is exhausted.

    (3) Priority numbers that don't receive a code assignment in any given month will be carried over for a code assignment by the 10th business day of the following month(s).

ii) An applicant may have no more than three priority numbers in any given month's rationing process/allocation/lottery.

iii) The lowest numbered priority request will receive a code assignment before the next higher priority number receives a code.

iv) If there are insufficient codes available for priority number requests from the preceding month(s), these requests will continue to be held over with their priority number for the subsequent month(s).

v) Any request receiving a priority number in a subsequent rationing month will be added to the bottom of any existing priority list and in the sequence drawn.

vi) The fact that there are priority numbers have been assigned, and the total number awaiting code assignment, will be posted on the NANPA Web site ("Bulletin Board"/"Jeopardy Information").

d) The lottery will be conducted as random drawing in two stages as indicated below:

i) Requests drawn in stage one will receive a code assignment.

    (1) These requests will be drawn, one-at-a-time, equal to the total number of codes available for assignment that month.

    (2) Codes will be assigned in the order in which the request was drawn.

ii) Requests drawn in stage two will receive a priority number for the next month's allocation.

    (1) These requests will be drawn, one-at-a-time, until the remaining number of OCNs with eligible requests has been drawn.

    (2) Priority numbers will be assigned, low to high, based on the sequence of the draw. (The first OCN drawn received number "one"; the second drawn receives "two"; etc.)

21)   Code Administrator's Responsibilities

a) By the 10th business day after a request is received, provide each applicant with feedback regarding the disposition of their request(s):

i)   Complete and accurate request -- Suspended until the "allocation/lottery date". (See "Allocation/Lottery Date" section)

ii)   Incomplete and/or inaccurate request -- Suspended from the current month's code rationing process and why.

iii)   Ineligible request -- Denied participation in the current month's code

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

rationing process and why.

b) *By the 10th business day after the "code allocation/lottery day" (See "allocation/Lottery Date"), provide each applicant with the final disposition of their request(s):*
   i) CO code assigned, what the NXX code is and what the code effective date is.
   ii) Priority Number received, what the number is and confirmation of automatic entry into the following month's code rationing process.
   iii) No code/No priority number received.

c) *The NANPA Code Administrator will adjust the requested code effective date, if necessary, to ensure the minimum industry notification interval of 45 calendar days.*
   i) For code assignments that do not require code allocation procedures or lottery, the code effective date must be at least 66 calendar days from the "submission deadline".
   ii) For code assignments made as a result of code allocation procedures or lottery, the code effective date will be no less than 66 calendar days from the "code assignment day".
   iii) If a request receiving a lottery code assignment already reflects an effective date that is at least 66 calendar days after the code assignment/lottery date, the date won't be changed.
   iv) The code effective date, changed or as requested, will be reflected on the Part 3 response sent to the code applicant.

22) Certification of Code Activation

a) *Code holders are required to certify that an assigned NXX code has been placed into service within 6 months after the published effective date.*

b) *Certification of code activation is to be provided to the NANPA CO Code Administrator via the Part 4.[4]*

c) *The Code Administrator will initiate code reclamation procedures if the Part 4 is not received within the industry-established timeframe.*

---

[4] *Central Office Code (NXX) Assignment Guidelines,* INC 95-0407-008, Re-issued September 18, 1998; A blank Part 4 is attached.

Jeopardy Procedures
602 NPA
(Arizona)
Extraordinary Code Conservation Measures

23) Decision Changes

If there are any changes in the Arizona Corporation Commission decision, a conference call will be scheduled for no later than April 1, 1999.

CERTIFICATE OF SERVICE

I, Vivian Lee, do hereby certify that copies of the foregoing Emergency Joint Petition for Suspension of Phoenix Area Code Relief Plan or, in the Alternative, Other Relief of MCI WorldCom, Inc. were sent via first dclass mail, postage paid, to the following on this 1st day of April, 1999.

Chairman William E. Kennard*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Linda Kinney*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Commissioner Harold Furchgott-Roth*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Paul Gallant*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Commissioner Michael Powell*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Kyle Dixon*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Commissioner Gloria Tristani*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Kevin Martin*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Commissioner Susan P. Ness
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Kathy Brown*
Chief of Staff
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Tom Power*
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Christopher Wright*
General Counsel
Federal Communications Commission
The Portals
445 12th Street, S.W., 8th Floor
Washington, DC 20554

Larry Strickling*
Chief, Common Carrier Bureau
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Yog Varma*
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Jordan Goldstein*
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Anna Gomez*
Chief, Network Services
Federal Communications Commission
2000 M Street, Room 235
Washington, DC 20554

Kris Monteith*
Competitive Pricing
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Blaise Scinto*
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Jared Carlson*
Federal Communications Commission
2000 M Street, N.W., Room 210C
Washington, DC 20554

Jeannie Grimes*
Federal Communications Commission
2000 M Street, N.W., Room 210G
Washington, DC 20554

Robert Atkinson*
Federal Communications Commission
The Portals
445 12th Street, S.W., 5th Floor
Washington, DC 20554

Diane Griffin Harmon*
Federal Communications Commission
2000 M Street, N.W., Room 235F
Washington, DC 20554

Tejal Mehta*
Federal Communications Commission
2000 M Street, N.W., Room 235F
Washington, dC 20554

International Transcription Services*
1231 20th Street, N.W.
Washington, DC 20036

Barry Pineles
Regulatory Counsel
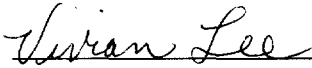GST Telecom Inc.
4001 Main Street
Vancouver, WA 98663

Eleanor Willis
Manager Regulatory Programs
Winstar, Inc.
1146 19th Street, N.W., 2nd Floor
Washington, DC 20036

Jackie Follis
Director of Government & Industry
 Affairs
Electric Lightwave, Inc.
4400 N.E. 77th Avenue
Vancouver, WA 98662

Emily Williams
ALTS
888 17th Street, N.W., Suite 900
Washington, DC 20006

The Honorable Jim Irvin, Chairman
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

The Honorable Carl J. Kunasek,
Commissioner
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

The Honorable Tony West,
Commissioner
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

Ron Conners
North American Numbering Plan
 Administrator
1200 K Street, N.W.
Washington, DC 20005

Alan Hasselwander, Chairman
North American Numbering Council
(via e-mail)

Melissa Newman
US West
1020 19th Street, NW, Suite 700
Washington, DC 20036

Frank Simone
AT&T
1120 20th Street, N.W., Suite 1000
Washington, DC 20036

*HAND DELIVERED

Vivian Lee
Vivian Lee